	1 2 3 4 5 6 7 8	shugret@grsm.com KATHERINE P. VILCHEZ (SBN: 212179) kvilchez@grsm.com GORDON REES SCULLY MANSUKHANI, LLP 315 Pacific Avenue San Francisco, CA 94111 Telephone: (415) 986-5900 Facsimile: (415) 986-8054 Attorneys for Defendant FORD MOTOR COMPANY							
	9	NORTHERN DISTRICT OF CALIFORNIA							
	10	KRISTY KOHNDROW an individual,	Case No. 5:23-cv-04354-PCP						
	11	Plaintiffs,	DECLARATION OF KATHERINE P. VILCHEZ IN SUPPORT OF						
, LLP	12	VS.	FORD MOTOR COMPANY'S OPPOSITION TO PLAINTIFF						
Gordon Rees Scully Mansukhani, LLP 315 Pacific Avenue San Francisco, CA 94111	13 14	FORD MOTOR COMPANY, a Delaware Corporation; and DOES 1 through 10, inclusive,	KRISTY KHONDROW'S MOTION FOR \$46,708.15 IN ATTORNEY'S FEES AND COSTS						
	15	Defendants.	[Filed with the Opposition and the Declaration of Hailey M. Rogerson]						
s Scu 15 Pac Franci	16								
lon Rees 31: San F	17		HEARING DATE: June 13, 2024 TIME: 10:00 a.m. Dept.: 8						
Gor	18		Sup. Ct. Comp. Filed: June 20, 2023						
	19 20		Removed: August 24, 2023						
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DECLARATION OF KATHERINE P. VILCHEZ IN SUPPORT OF FORD MOTOR COMPANY'S OPPOSITION TO MOTION FOR ATTORNEY'S FEES AND COSTS

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T	Katherine	Р	Vilchez	declare	as follows
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- I am an attorney duly licensed to practice law in the State of California 1. and the United States District Court for the Northern District of California, and I am a partner at Gordon Rees Scully Mansukhani, LLP, attorney of record for Defendant Ford Motor Company ("Ford"). I am a member in good standing with the State Bar of California. I have personal knowledge of the following facts, except for those based on information and belief, which I believe to be true, and if called upon to testify, I could and would competently testify to their truth and accuracy.
- This declaration is submitted in support of Ford's Opposition to Plaintiff's Motion for Attorney's Fees and Costs.
- 3. Attached hereto as **Exhibit A** is a true and correct copy of Joseph Kaufman & Associates' fee and cost invoice in this matter.
- 4. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's April 27, 2023, Demand Letter to Ford.
- 5. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff's Complaint filed on July 20, 2023.
- Attached hereto as **Exhibit D** is a true and correct copy Ford's Rule 68 6. Offer.
- 7. After the case was settled on February 7, 2024, Plaintiff waited until April 11, 2024 to provide a fee demand of \$26,760.15 in this matter. Attached hereto as **Exhibit E** is a true and correct copy of Plaintiff's April 11, 2024, fee demand email.
- 8. On April 30, 2024, Plaintiff's counsel increased their demand to \$31,339.65, adding the fees allegedly incurred for drafting the Fee Motion. Attached hereto as **Exhibit F** is a true and correct copy of Plaintiff's April 30, 2024, fee demand email.

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9.	I contacted Plaintiff's counsel on May 10, 2024 regarding the fe	e
negotiations	and, on May 13, 2024, offered \$22,000.00 to settle the fees and costs i	n
this matter.	However, no resolution was reached.	

- It is Ford's position that the fees and costs could have been settled in 10. this matter if Plaintiff's counsel had not drafted and filed the fee motion before the parties had time to negotiate, increasing the fee demand.
- When Plaintiff made settlement demand on September 2, 2023, she 11. demanded \$16,750.00 to settled the fees and costs in this matter. Attached hereto as Exhibit G is a true and correct copy of Plaintiff's September 2, 2023 fee demand email.
- I have opposed over 30 fee motions in Song-Beverly Act cases. In 12. every case where it was sought, the Court has refused to award fees for work performed before Plaintiffs' counsel was retained by Plaintiffs.
- 13. Attached hereto as Exhibit H is a true and correct copy of Law Office of Jeffrey L. Le Pere's fee and cost invoice in this matter.
- Attached hereto as Exhibit I is a true and correct copy of Michael Wesner's August 22, 2023 email in this matter.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct, and that this Declaration was executed on May 17, 2024, in Fair Oaks, CA.

> /s/ Katherine P. Vilchez By: Katherine P. Vilchez